

ORIGINAL

FILED
Clerk
District Court

AUG 18 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

KRISTIN D. ST. PETER T-00039
Assistant Attorney General
Commonwealth of the Northern Mariana Islands
Office of the Attorney General-Civil Division
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Saipan, MP 96950

Attorney for: Defendant Sosebee

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C. FORELLI,
WILLIAM C. BUSH, D. DOUGLAS COTTON,
L. DAVID SOSEBEE, ANDREW CLAYTON,
UNKNOWN AND UNNAMED PERSONS IN
THE CNMI OFFICE OF THE ATTORNEY
GENERAL, ALEXANDRO C. CASTRO, JOHN
A. MANGLONA, TIMOTHY H. BELLAS,
PAMELA BROWN, ROBERT BISOM, AND
JAY H. SORENSEN,

Defendants.

Case No. 05-0027

**DEFENDANT SOSEBEE'S
NOTICE OF MOTION
TO DISMISS SECOND AMENDED
COMPLAINT**

[Fed. R. Civ. P. 12 (b) (6)]

SEP 28 2006

HEARING:

TIME: 9:00 a.m.

JUDGE: HON. ALEX R. MUNSON

NOTICE
SEP 28 2006

PLEASE TAKE NOTICE THAT on _____, 2006, at 9:00 a.m./p.m., or

as soon thereafter as the matter may be heard, in the above-entitled Court, the Office of the Attorney

1 General of the Commonwealth of the Northern Mariana Islands, on behalf of L. David Sosebee, will
2 and hereby does move this Court, pursuant to Rules 12(b)(6) of the Federal Rules of Civil Procedure
3 to dismiss this action for failure to state a claim upon which relief can be granted.

4 This Motion is based upon this Notice of Motion, Motion and incorporated Memorandum of
5 Points and Authorities, all pleadings and papers on file herein, all matters of which judicial notice may
6 be taken, and upon such further argument and evidence as may be considered by the Court at or before
7 the hearing on this matter.

8 Respectfully submitted,

9 OFFICE OF THE ATTORNEY GENERAL

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11 Dated: August 18, 2006.

12 By


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Kristin D. St. Peter